

EXHIBIT C

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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-1789 (BRL)

SIPA Liquidation

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

**AARON BLECKER'S FIRST SET OF INTERROGATORIES
TO THE TRUSTEE**

PLEASE TAKE NOTICE that pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure (the "Federal Rules") and Rule 7033 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules") and Local Civil Rules of the United States District Court for the Southern District of New York (the "Local Rules") and this Court (the "Local Bankruptcy

Rules”), the claimant, Aaron Blecker, through his counsel, requests that the Trustee respond in writing to the interrogatories set forth herein and deliver those responses to the offices of Becker & Poliakoff LLP, 45 Broadway, 8th Floor, New York, NY 10006 within 35 days of the date set forth below.

DEFINITIONS AND INSTRUCTIONS

1. The rules of construction and definitions in Local Rule 26.3, as adopted by Rule 7026-1 of the Local Bankruptcy Rules, are hereby incorporated by reference. All defined terms, including those defined in Local Rule 26.3 are capitalized herein.

2. “Accounts” shall mean the following accounts held at BLMIS by Aaron Blecker: 1B0156, 1B0157, 1B0022, 1B0023.

3. “BLMIS” means Bernard L. Madoff Investment Securities LLC and any and all related entities, including all representatives, agents, employees, attorneys and/or persons acting or purporting to act on their behalf.

4. “Claims” means claim numbers 3907, 3906, and 3900.

5. “Claimant” shall mean Aaron Blecker and all affiliates, representatives, agents, employees, attorneys and/or persons acting or purporting to act on his behalf.

6. “Determination of Claim” shall mean the October 19, 2009 Notice of Trustee’s determination of claim for BLMIS Account No. 1B0022, which is attached as Exhibit A to Claimant’s Second Set of Requests for Documents to the Trustee.

7. “November 11, 2010 Correspondence” shall mean the Trustee’s response to the Claimant’s October 19, 2010 objection to the Trustee’s determination of claim, which is attached as Exhibit B to the Claimant’s Second Set of Requests for Documents to the Trustee.

8. “Trustee” or “You” shall mean Irving H. Picard, trustee for the liquidation of the business of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa *et seq.* (“SIPA”), as well as any of the Trustee's agents, accountants, attorneys, employees, servants, assigns, or any individual or entity acting or purporting to act on the Trustee's behalf.

9. Federal Rules 26 and 27, made applicable to this proceeding pursuant to Bankruptcy Rules 7026-7037, and the Local Rules, are hereby incorporated by reference and apply to each of the following instructions:

a. If a response to an interrogatory is based upon information and belief, set forth the source of the information and grounds for the belief.

b. If you object on the basis of ambiguity or vagueness to an Interrogatory, or to any related definition or instruction, You must respond to the Interrogatory and set forth Your interpretation of the language You claim is vague or ambiguous.

c. If you refuse to provide a response to an Interrogatory due to an assertion of attorney-client privilege, the work product doctrine, or any other privilege, Your response should include a statement of the basis for the claim sufficient to the Trustee to evaluate the claimed privilege or production.

d. If You cannot provide, or object to providing, a complete answer to a particular Interrogatory, the Interrogatory should be answered to the extent possible and an explanation should be provided as to why only a partial answer is given.

e. If You discover that a response is incomplete or incorrect, You must, in a timely manner, supplement, or correct such response in accordance with Rule 7026 of the Bankruptcy Rules and Rule 26(e) of the Federal Rules.

INTERROGATORIES

1. Identify each Person who was involved in answering these interrogatories and identify each document that was referred to in answering these requests by including the interrogatory number to which each document pertains.

ANSWER:

2. Identify all Documents concerning the facts upon which You base your denials of Claims, and Identify each Person with knowledge of the facts upon which You base Your denials.

ANSWER:

3. Set forth in detail the complete factual basis for Your contention set forth on page 6 of his Reply Memorandum of Law in Support of Trustee's Motion Affirming Application of Net Investment Method to Determination of Customer Transfers Between BLMIS Accounts (Adv. Pro. 08-01789, Doc. No. 6926) (the "Reply Brief") that You "confirmed that when 'PW' appears on the customer statement and lists a company name following 'CHECK' in the detail field, the checks were in fact made out to and cashed by customers." Also, Identify all Documents on which You Base Your contention and Identify each person with knowledge of the relevant facts.

ANSWER:

4. Set forth in detail the complete factual basis for Your position set forth on page 6 of the Reply Brief that Madoff was paying dividends to customers, which were reflected as “profit withdrawals” on BLMIS account statements. Also, Identify all Documents concerning the facts on which You Base Your contention and Identify each person with knowledge of the relevant facts.

ANSWER:

5. Set forth in detail the complete factual basis for Your contention that a transaction on a BLMIS account statement that lists various company names after the word “CHECK,” for example “CHECK VIACOM,” represents a dividend payment to a BLMIS customer. Also, Identify all Documents concerning the facts on which You base Your contention and Identify each Person with knowledge of the facts upon which You base Your contention; and identify every other BLMIS customer that you contend received dividend checks from BLMIS..

ANSWER:

6. Identify all Documents concerning the withdrawals set forth on the itemization of deposits and withdrawals in the November 11, 2010 Correspondence, including tax documents, and Identify each Person with knowledge of the relevant facts.

ANSWER:

7. Identify all Documents concerning the withdrawals set forth on Table 1 to the Determination of Claim, including tax documents, and Identify each Person with knowledge of the relevant facts.

ANSWER:

8. Identify all expert witnesses on whose findings or opinions you have relied in forming your positions and/or contentions set forth in Interrogatory Nos. 3-5 above, including each expert's field of expertise and qualifications. State the substance of the facts and opinion as to which each expert is expected to testify, along with a summary of the grounds for each such opinion.

ANSWER:

9. Set forth in detail the complete factual basis of your position that Claimant received the withdrawals set forth in Table 1 to the Determination of Claim and identify any Documents, including, but not limited to, cancelled checks, correspondence, and any other documents which would support such position.

ANSWER:

10. Set forth in detail the complete factual basis of your position that withdrawals the itemization of deposits and withdrawals in the November 11, 2010 Correspondence were made

by the account holders and identify any Documents, including, but not limited to, cancelled checks, correspondence, and any other documents which would support such position.

ANSWER:

Dated: New York, New York
January 7, 2015

Respectfully submitted,

BECKER & POLIAKOFF LLP

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